

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

WILLIS TOWERS WATSON PUBLIC	:	
LIMITED COMPANY AND WILLIS RE	:	
INC.,	:	Case No. 21-cv-00487 (JMF)
Plaintiffs,	:	
	:	
v.	:	<del><b>PROPOSED JOINT ORDER</b></del>
	:	
PAUL HERRIOTT,	:	
	:	
Defendant.	:	

Plaintiffs Willis Towers Watson Public Limited Company and Willis Re Inc. (“Plaintiffs”) and Defendant Paul Herriott (“Defendant”) (together, the “Parties”), jointly submit the following proposed Order pursuant to the Court’s February 12, 2021 Order (ECF No. 43).

1. Subject to the Court’s approval, the Parties stipulate and agree that the deadlines for discovery, additional briefing, and other pre-hearing materials for Plaintiffs’ motion for a preliminary injunction shall be as follows:

- Electronic delivery of document demands, non-party subpoenas and deposition notices on or before February 24, 2021.
- Electronic delivery of responses to document demands and non-party subpoenas on or before March 10, 2021.
- Party and non-party depositions via Zoom or similar platform shall commence on March 15, 2021 and shall be completed by March 26, 2021.
- Defendant’s (supplemental) memorandum of law in opposition to the motion for a preliminary injunction shall be filed via ECF on or before April 2, 2021.
- Plaintiffs’ reply memorandum of law shall be filed via ECF on or before April 9, 2021.
- The Parties shall exchange via electronic mail, on or before April 9, 2021, a list of witnesses and exhibits for the April 14-15, 2021 hearing, along with any sworn witness declarations to be used at the hearing in lieu of direct examination pursuant to the Court’s rules.

Dated: February 19, 2021  
New York, New York

**WHITE AND WILLIAMS LLP**

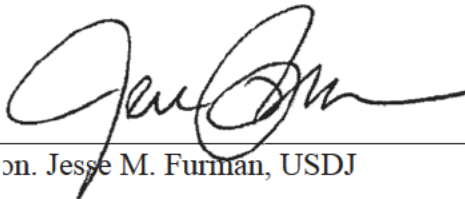
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IT IS SO ORDERED.

Dated: February 19, 2021  
New York, New York

  
Hon. Jesse M. Furman, USDJ

The Clerk of Court is directed to terminate  
ECF No. 48.